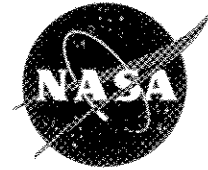


National Aeronautics and Space Administration

Headquarters

Washington, DC 20546-0001



March 4, 2010

General Law Practice Group

Reply to Attn of:

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the American Astronautical Society (AAS) 48<sup>th</sup> Robert H. Goddard Memorial Symposium Luncheon on March 10-11, 2010

The American Astronautical Society (AAS), a non-profit organization under 501(c)(3), will host its 48<sup>th</sup> Robert H. Goddard Memorial Symposium Luncheon on March 10-11, 2010, at the Greenbelt Marriott Hotel in Greenbelt, MD, from 8:00am-5:00pm daily. The theme for this year's Symposium is "Earth and Beyond: The Next Decades." Lori Garver, NASA Deputy Administrator, and John Holdren, Science Advisor to the President and Director, Office of Science and Technology Policy, are this year's keynote speakers.

The Symposium and related events will be widely attended by individuals from other Federal agencies, academia, the aerospace industry, and others who are involved in NASA projects. The estimated costs for food and beverages is \$30 per person for the reception. Approximately 200 people are expected to attend. AAS is solely responsible for selecting, inviting, and seating of NASA guests.

I find these events meet the requirements of a "widely attended gathering" as defined in 5 C.F.R. § 2635.204(g). There is an Agency interest in having NASA personnel attend these events and this Symposium will allow NASA employees, including employees in non-career positions for which Executive Order 13490 requires signing an ethics pledge to share their views' and information about current NASA activities with others interested in space exploration. Accordingly, NASA employees whose duties do not substantially affect the event sponsors may accept an invitation for free attendance to the event for themselves and their accompanying guests.

However, NASA employees whose duties may substantially affect the event sponsors, such as by way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

  
Adam F. Greenstone